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U.S. BANKRUPTCY COURT
PATRICIA GRAY, CLERK

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re: *(Name of Debtor)*

USA COMMERCIAL MORTGAGE COMPANY,

Debtor(s)

Case No. BK- S-06-10725 LBR

Adv. # _____

Chapter ☐ 7 ☒ 11 ☐ 13

**MOTION FOR PERMISSION TO FILE IN PAPER FORMAT
DUE TO EXEMPTION OR EXCEPTIONAL CIRCUMSTANCES**

Michaelson, Susi & Michaelson

Pursuant to Administrative Order 04-3, movant Professional Corporation hereby

requests permission to file documents in traditional paper format on the grounds that *(Motion must be accompanied by a supporting affidavit or declaration of the movant):*

☐ Movant is exempt from the requirement that filings be made in electronic form because *(state why):* _____

or

☒ Exceptional circumstances exist which prevent filing by electronic means

1. Document

The document(s) which the movant seeks permission to file in paper format are *(list title of each document):*

REQUEST FOR SPECIAL NOTICE & TO BE ADDED TO MASTER MAILING LIST

2. Exceptional Circumstances

If permission to file in paper format is sought on the basis of exceptional circumstances, the movant states the following as grounds for the Motion:

(a). ☐ Movant's Internet service is not available due to circumstances which cannot be prevented.

1 (i). Describe the nature and extent of the circumstances which have made
the Internet service unavailable (*be specific*):

2 N/A

3
4
5 (ii). Describe what steps will be taken to ensure that the Internet service
will be operable for electronic filing in the future:

6 My staff continues its efforts to qualify for electronic
7 filing and anticipates that the process will be completed
within the next several days.

8
9 (b). ☒ Other grounds exist for the Exceptional Circumstances Motion (*be
specific*):

10 Because of the rapid pace at which this complex case is pro-
11 gressing, it is important that the Request for Special Notice
be filed now so that our clients can be informed timely with
12 respect to matters which may affect their interests.

13 (c). ☐ Movant has filed a prior Exceptional Circumstances Motion

14 (i). Number of prior motion(s): 3

15 (ii). Date of the prior motion(s): 4/26/06

16 (iii). Reason for the prior motion(s): Insufficient time to
qualify for e-filing.

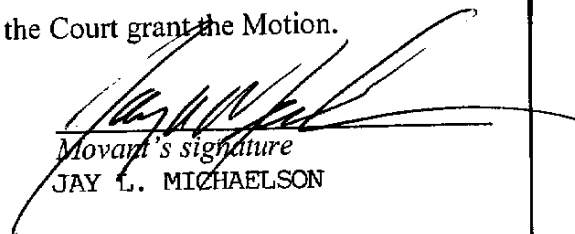
17 (iv). Case number and disposition for each prior motion:
18 S-06-10725-LBR and related cases.
Motions granted.

19 3. ☒ Movant's affidavit or declaration supporting this Motion is attached pursuant to Section
20 3(b)(i) of Administrative Order 04-3.

21 4. ☒ Movant hereby also submits a proposed order pursuant to Administrative Order 04-3 at
22 Section 3(b)(ii).

23 Based upon the foregoing, movant requests that the Court grant the Motion.

24 Date: 5/9/06

25 
Movant's signature
JAY L. MICHAELSON

26
27 December 20, 2004

DECLARATION OF JAY L. MICHAELSON IN SUPPORT OF
MOTION FOR PERMISSION TO FILE IN PAPER FORMAT

I, Jay L. Michaelson, declare:

1. I am a member of Michaelson, Susi & Michaelson, a Professional Corporation, attorneys for various direct lenders in this case.

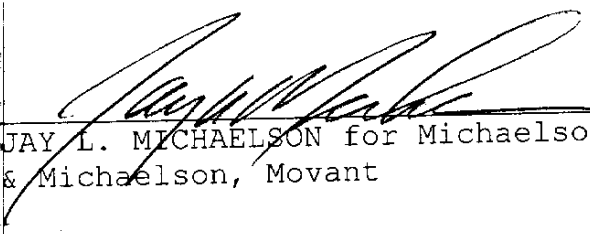
2. My staff continues its efforts to qualify for electronic filing and anticipates that the process will be completed with the next several days.

3. Because of the rapid pace at which this complex case is progressing, it is important that the Request for Special Notice be filed now so that our clients can be informed timely with respect to matters which may affect their interests.

4. Our firm has previously filed three Exceptional Circumstances Motions: two Petitions for Permission to Practice in this Case Only by Attorney not Admitted to the Bar of this Court, and the Opposition to Debtors' Motion for Order Approving Cash Management Procedures and Interim Use of Cash, all filed on April 27, 2006.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 11 day of May, 2006, at Santa Barbara, California.


JAY L. MICHAELSON for Michaelson, Susi
& Michaelson, Movant